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REMARKS

This is a full and timely response to the non-final Official Action mailed October 2, 2006. Reconsideration of the application in light of the following remarks is respectfully requested.

Claim Status:

No amendments are made to the application by the present paper. Claims 7 and 30 were cancelled previously without prejudice or disclaimer. No new claims are added. Thus, claims 1-6, 8-29 and 31 are currently pending for further action.

Prior Art:

In the outstanding Office Action, claims 1, 4-6, 11, 13-16, 26, 27, 29 and 31 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the combined teachings of U.S. Patent No. 6,973,589 to Wright et al. ("Wright") and U.S. Patent No. 6,526,581 to Edson ("Edson"). For at least the following reasons, the rejection is respectfully traversed.

Claim 1 recites

A computer network for providing services comprising:
a plurality of computing elements each of which comprises computing resources for supporting one or more electronic services, wherein said services are controlled or operated by commands or data transmitted via email;
a mail server for receiving and routing email; and
a redirector, *separate from said mail server*, communicatively connected to said mail server and each of said computing elements, *wherein said redirector receives email from said mail server, wherein each e-mail contains a command or data for a specific said service, with or without being addressed to a specific computing element, and wherein said redirector is configured to selectively match an available computing element with a specific service request of an incoming e-mail and forward at least a portion of the email to that computing element so as to deliver said command or data to that specific service, such that said redirector serves as an email proxy for said plurality of computing elements;*

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wherein said electronic services are controlled by said email routed by said redirector among said plurality of computing elements.
(Emphasis added).

Independent claim 26 similarly recites:

A computer network for providing electronic services comprising:
a plurality of computing elements each of which comprises computing resources for supporting one or more electronic services, wherein said services can be controlled or executed by commands or data transmitted via email;
a mail server for receiving and routing email; and
a redirector, *separate from said mail server*, communicatively connected to said mail server and each of said computing elements, *wherein said redirector receives email from said mail server, wherein each e-mail contains a command or data for a specific said service, with or without being addressed to a specific computing element, and wherein said redirector is configured to selectively match an available computing element with a specific service request of an incoming e-mail and forward at least a portion of the email to that computing element so as to deliver said command or data to that specific service, such that said redirector serves as an email proxy for said plurality of computing elements*; and
a service handler on at least one of said computing elements for automatically obtaining an electronic service using an incoming email and installing that service on the computing element corresponding to the service handler.
(Emphasis added).

In contrast, the combination of Wright and Edson fails to teach or suggest the redirector of claims 1 and 26. In fact, Wright and Edson appear to be almost entirely inapplicable to Applicant's claimed subject matter.

By way of relevant background, Wright teaches an Intelligent Electronic Device (105, Fig. 2) ("IED"). The IED (105) sits between a network, such as the internet (port 215), and a power system (107) so that email commands can be transmitted over the network to the IED (105) for controlling the power system (107). The IED (105) responds to email commands and controls the power system (107) accordingly through a power system interface (222).
(Wright, col. 5, line 61 to col. 6, line 7).

Similarly, Edson, as cited in the Office Action, allows a user to remotely control household appliances. According to Edson, "[t]he gateway 13 and the communications with

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the controller 41C enable monitoring and control of virtually any home appliance. The user might check the status of a microwave oven from the PC 43, and enter further operational commands if desired. Alternatively, the controller 41C can send alarm reports through the gateway 13 and the Internet to any desired external location, for example to inform a user at her office of a problem with the air conditioning, or the user might send control information from a remote location to adjust the air conditioning temperature setting.” (Edson, col. 15, lines 29-39).

In contrast, Applicant’s claims have nothing to do with managing and controlling a power system (as in Wright) or home appliances (as in Edson). Applicant claims “a plurality of computing elements each of which comprises computing resources for supporting one or more electronic services.” As stated in Applicant’s specification, “[e]xamples of computing elements include computer systems, server systems,” etc. (Applicant’s specification, paragraph 0003). In contrast, a power system (as in Wright) and home appliances (as in Edson) are not a plurality of computing elements each of which has one or more electronic services executing thereon, as claimed. Thus, Wright and Edson fail to teach or suggest the claimed “plurality of computing elements” that each support one or more electronic services.

Moreover, with this background, it becomes clear that Wright and Edson fail to teach or suggest the claimed redirector. In this regard, the Action refers exclusively to the teachings of Wright. (Action of 10/2/06, pp. 2 and 3). Specifically, the Action construes Wright’s electronic mailbox (220) as the claimed mail server and Wright’s IED (105) as the claimed redirector. (Action of 10/2/06, p. 3). However, the electronic mailbox (220) is part of and is the email functionality of the IED (105). (See Wright, Fig. 2, element 105 inclusive of element 220).

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In contrast, Applicant claims "a mail server for receiving and routing email; and a redirector, *separate from said mail server.*" (Emphasis added). The IED (105) of Wright is not *separate from* its electronic mailbox (220). Rather, the electronic mailbox (220) is part of the IED (105). The IED (105) of Wright has no email capability or functionality without the mailbox (220). Thus, the combination of Wright and Edson fails to teach or suggest the claimed "mail server for receiving and routing email; and a redirector, *separate from said mail server.*" (Emphasis added).

Applicant further claims that "said redirector receives email from said mail server." In contrast, the IED (105) of Wright does not, and cannot, receive email from the mailbox (220). As demonstrated above, the mailbox (220) is part of the IED (105). The IED (105) has no ability to process email apart from the mailbox (220). Thus, the mailbox (220) cannot send email to the IED (105) of which it is already a part. Consequently, the combination of Wright and Edson fails to teach or suggest the claimed redirector that receives email from a separate mail server.

Applicant further claims "wherein each e-mail [received by the redirector] contains a command or data for a specific said service, *with or without being addressed to a specific computing element.*" The combination of Wright and Edson does not teach or suggest this subject matter. The combination of Wright and Edson does not teach or suggest a redirector that processes email that both is and is not addressed to a specific computing element. The teachings of Wright and Edson do not allow for the claimed case in which an email being handled is addressed to a specific service *without* being addressed to a specific computing element. Thus, combination of Wright and Edson does not teach or suggest the claimed redirector "wherein each e-mail [received by the redirector] contains a command or data for a specific said service, *with or without being addressed to a specific computing element.*"

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In this regard, the recent Office Action demonstrates a clear failure to understand what Applicant has disclosed and claimed. According to the Office Action, "an inherent feature is that the email must identify the specific element to be acted upon, otherwise the IED would never know which element to act upon." (Action of 10/2/06, p. 3). This is totally incorrect and is one of the specific issues addressed by Applicant's claimed subject matter.

In Applicant's claims, the email "contains a command or data for a specific said service, with or without being addressed to a specific computing element." There may be several different computing elements executing the designated service, or the designated service may be launched on a new computing element as needed. Consequently, it is *not* necessary, as the Office Action argues, for the email to be addressed to a specific computing element. Hence, Applicant expressly recites that the email is processed "with or without being addressed to a specific computing element." The Office Action cannot disregard this explicit language from Applicant's claims.

The redirector then has the functionality to determined, based on the *service* called, rather than a specific computing element, which computing element should receive the unaddressed email. As recited in Applicant's claims, "said redirector is configured to selectively match an available computing element with a specific service request of an incoming e-mail and forward at least a portion of the email to that computing element so as to deliver said command or data to that specific service, such that said redirector serves as an email proxy for said plurality of computing elements." As conceded above by the Office Action, the IED of Wright does not have this functionality and, therefore, cannot be identified with Applicant's claimed redirector. Consequently, the combination of Wright and Edson fails to teach or suggest the claimed redirector.

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The Office Action further makes the erroneous statement that “the IED interprets the email for the elements, and therefore acts on the elements behalf as a proxy.” (Action of 10/2/06, p. 3). This is not what a proxy is or does as explicitly recited in Applicant’s claims. According to Applicant’s claims, a proxy is not merely a device that processes or “interprets” an email. Rather, a proxy is a device to which email can be directed “with or without being addressed to a specific computing element” and which then routes the email to an appropriate computing element “so as to deliver said command or data to [a] specific service.” The Office Action cannot use some other definition of “proxy” contrary to what is recited in the claims simply to cover a failure to understand Applicant’s subject matter. The combination of Wright and Edson absolutely fails to teach or suggest the claimed redirector that “serves as an email proxy for said plurality of computing elements.”

For any and all of these many reasons, the rejection based on Wright and Edson should be immediately reconsidered and withdrawn.

Additionally, claim 26 further recites “a service handler *on at least one of said computing elements* for automatically obtaining an electronic service using an incoming email and installing that service on the computing element corresponding to the service handler.” (Emphasis added). In this regard, the Office Action cites to Wright at col. 7, lines 18-40. (Action of 10/2/06, p. 5). This portion of Wright teaches that the “IED 105 may receive information 300, such as settings, configuration, operating code, requests for information or one or more commands, through an e-mail messaging system.” (Wright, col. 7, lines 18-40). This, however, refers to operating code received *by the IED (105)*, which the Office Action equates with the claimed redirector, not a computing element. In contrast, claim 26 recites a service handler *on a computing element* that is served by the redirector, where the service handler is “for automatically obtaining an electronic service using an incoming email and

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installing that service on the computing element corresponding to the service handler."

(Emphasis added). There is no teaching or suggestion in Wright or Edson of any such element on a computing element served by a redirector.

Consequently, it is inescapably clear that the combination of Wright and Edson fails to teach or suggest a great many of the elements of Applicant's claims. "To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974)." M.P.E.P. § 2143.03. Accord. M.P.E.P. § 706.02(j). For these many reasons, the rejection based on Wright of claims 1 and 26 should be reconsidered and withdrawn.

Independent claim 11 recites:

A method of providing services with a computer network that comprises a plurality of computing elements each of which comprise computing resources for supporting one or more services that are controlled or operated by commands or data received via email, and a redirector, communicatively connected to each of said computing elements; said method comprising:

receiving an e-mail message, said message containing a command or data configured for a specific service on one of said computing elements, wherein said e-mail message relates to said specific service, with or without being addressed to a specific computing element; and

routing at least some of said e-mail message comprising said command or data to a corresponding computing element to control or execute said specific service, such that said redirector serves as an e-mail proxy for said computing elements, wherein said redirector determines which computing element receives said command or data from said e-mail message based on the specific service to which that e-mail message relates.

In contrast, as demonstrated above, the combination of Wright and Edson fails to teach or suggest "receiving an e-mail message, said message containing a command or data configured for a specific service on one of said [plurality of] computing elements, wherein said e-mail message relates to said specific service, with or without being addressed to a

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specific computing element.” Wright and Edson further fail to teach or suggest “routing at least some of said e-mail message comprising said command or data to a corresponding computing element to control or execute said specific service, such that said redirector serves as an e-mail proxy for said computing elements, wherein said redirector determines which computing element receives said command or data from said e-mail message based on the specific service to which that e-mail message relates.”

The combination of Wright and Edson thus fails to teach or suggest any of this subject matter recited in claim 11. For at least these reasons, the rejection of claim 11 should be reconsidered and withdrawn.

The various dependent claims of the application recite further subject matter that is not taught or suggested by the combination of Wright and Edson. Specific, non-exclusive examples follow.

Claim 4 recites “said redirector comprises a service handler for extracting an access function from incoming email messages; and said service handler complies with said extracted access function by transmitting commands or data to at least one of said plurality of computing elements supporting said services.” Claim 13 recites similar subject matter. In contrast, as demonstrated above, the IED (105) of Wright receives commands via email for *itself*. It does not include a service handler that extracts an access function from an incoming email and complies with the access function by *transmitting commands or data* to one of a plurality of computing elements supporting a variety of electronic services. Wright is entirely inapplicable to claims 4 and 13.

Claim 5 recites “wherein said commands or data comprises a service.” Claims 14 and 27 recite similar subject matter. Wright does not teach or suggest extracting a service from

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an email and transmitting that service to one of a plurality of computing elements. Claim 27 specifically recites a service handle *on of the computing elements* that receives an email from the redirector and extracts a service from that email. Wright does not teach or suggest this subject matter.

Claim 6 recites "wherein said commands or data comprises a specified location where a service can be accessed." Claim 15 recites similar subject matter. Wright does not teach or suggest this subject matter.

Claim 31 recites "a separate service handler on each of said plurality of computing components." Wright does not teach or suggest this subject matter. Moreover, the Office Action fails to indicate how or where Wright teaches a plurality of computing elements each having a separate service handler.

For at least these additional reasons, the rejection based on Wright of these dependent claims should be further reconsidered and withdrawn.

Claims 2, 3, 8, 9, 12, 17, 18, 21-25 and 28 were rejected under 35 U.S.C. § 103(a) over the combined teachings of Wright, Edson and U.S. Patent No. 5,819,110 to Motoyama ("Motoyama"). This rejection is respectfully traversed for at least the same reasons given above with respect to the independent claims.

Additionally, claim 8 recites: "a firewall through which said email messages are received, said mail server and redirector both being protected within a common firewall." Claim 17 recites similar subject matter. In this regard, the Office Action takes "Official Notice" "that both the concept and advantages of providing for a firewall to protect the email processing center is well known." (Action of 10/2/06, p. 7). This is irrelevant.

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Claim 8 does not merely recite a firewall, but that both a server and redirector and defined and claimed by Applicant are protected within a common firewall. This subject matter has not been shown to be taught or suggested by the prior art of record. Consequently, Applicant hereby requests that prior art actually teaching the features of claims 8 and 17 be introduced into the record or that the rejection of claims 8 and 17 be reconsidered and withdrawn.

Claim 9 recites "further comprising a web client within said firewall communicating with said redirector to obtain access to said services." Claim 18 recites similar subject matter. Again, Wright and Motoyama fail to teach or suggest this subject matter, and the Office Action fails to clearly indicate how or where the prior art teaches or suggests this subject matter. Thus, Applicant again requests that prior art actually teaching the features of claims 9 and 18 be introduced into the record or that the rejection of claims 9 and 18 be reconsidered and withdrawn.

Claims 10, 19 and 20 were rejected under 35 U.S.C. § 103(a) over the combined teaching of Wright, Edson, Motoyama and U.S. Patent No. 6,480,901 to Weber et al. ("Weber"). This rejection is respectfully traversed for at least the same reasons given above with respect to the independent claims.

Additionally, claim 10 recites "wherein said redirector generates web pages related to said services for said web client." Claims 19 and 20 dependent, respectively from claims 18 and 11, and recite: "generating web pages for a [said] web client with said redirector, said web pages being related to said services."

In this regard, the Action cites to Weber at Fig. 7 and col. 14, lines 23-41. (Action of 10/2/06, p. 9). However, these portions of Weber do not teach or suggest a redirector, as

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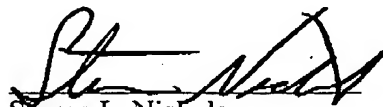
disclosed and claimed, that generates web pages relating to the services provided on a plurality of connected computing elements for which the redirector serves as an email proxy. For at least this additional reason, the rejection of claims 10, 19 and 20 should be reconsidered and withdrawn.

Conclusion:

For the foregoing reasons, the present application is thought to be clearly in condition for allowance. Accordingly, favorable reconsideration of the application in light of these remarks is courteously solicited. If the Examiner has any comments or suggestions which could place this application in even better form, the Examiner is requested to telephone the undersigned attorney at the number listed below.

Respectfully submitted,

DATE: January 2, 2007



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